ORIGINAL

BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C.

ORIGINAL FILE

In re Application of	MM DOCKET NO. 92-116
UHURU COMMUNICATIONS, INC.	File No. BRED-910230WF
For Renewal of License of Station WICO-FM Binghamton, New York	
and	
WSKG PUBLIC TELECOMMUNICATIONS COUNCIL	File No. BPED-910501MB
For a Construction Permit for a New FM Station Binghamton, New York	
ARROWHEAD CHRISTIAN CENTER	File No. BPED-910501MC
For a Construction Permit for a New FM Station Binghamton, New York	

TO: Administrative Law Judge
Arthur I. Steinberg

PETITION FOR LEAVE TO AMEND

WSKG Public Telecommunications Council ("WSKG"), by its attorneys and pursuant to Section 73.3522(b) of the Commission's Rules, hereby petitions for leave to amend its application. In support whereof, the following is shown:

The attached amendment provides the environmental impact information required by the Hearing Designation Order, MM Docket No.

92-116, released June 8, 1992. The environmental information demonstrates that workers authorized access to the tower will be protected from RF radiation exposure exceeding the ANSI guidelines.

Insofar as this amendment is submitted pursuant to the HDO within the time period allowed for amendments as of right under Section 73.3522(b)(2), WSKG respectfully requests that its amendment be accepted.

Respectfully submitted,

WSKG PUBLIC TELECOMMUNICATIONS COUNCIL

By Todd D. Gray

Richard D. Marks
Todd D. Gray
Margaret L. Miller

DOW, LOHNES & ALBERTSON
1255 Twenty-third Street, N.W.
Suite 500
Washington, D.C. 20037
(202) 857-2500

Its Attorneys

July 7, 1992

CERTIFICATE OF SERVICE

I, Marilyn Whipple, secretary in the law firm of Dow, Lohnes & Albertson, do hereby certify that the foregoing "PETITION FOR LEAVE TO AMEND" was mailed first-class, postage prepaid, this 7th day of July, 1992, to the following:

* Arthur I. Steinberg
Administrative Law Judge
2000 L Street, N.W., Room 214
Washington, D.C. 20054

* Charles E. Dziedzic, Esq.
Chief, Hearing Branch
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7212
Washington, D.C. 20054

* Chief, Data Management Staff
Audio Services Division
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Room 350
Washington, D.C. 20054

* Dennis Williams, Chief
FM Branch
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Room 322
Washington, D.C. 20054

James L. Winston, Esquire
Rubin, Winston, Diercks,
Harris & Cooke
1730 M Street, N.W., Suite 412
Washington, D.C. 20036
Attorney for Uhuru Communications, Inc.

William H. Crispin, Esq.
Verner, Liipfert, Bernhard, McPherson and Hand
901 15th Street, N.W., Suite 700
Washington, D.C. 20005-2301
Attorney for Arrowhead Christian Center

Marilyn Whipple

* HAND DELIVERED

WSKG
PUBLIC BROADCASTING

July 2, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
Washington, DC 20554

Re: Amendment to Pending Application for a New Noncommercial Educational Station in Binghamton, New York; File No. BPED-910501MB

Dear Ms. Searcy:

WSKG Public Telecommunications Council hereby amends its application for a new noncommercial educational FM station at Binghamton, New York to provide additional environmental assessment information, including information about the protection of workers authorized access to the transmitting tower.

Respectfully Submitted,

WSKG PUBLIC TELECOMMUNICATIONS COUNCIL

Charles F. Mulvey

By: Charles F. Mulvey
Its: Vice President for Engineering
Date: July 2, 1992

WSKG PUBLIC TELEVISION and RADIO

P.O. Box 3000 Binghamton, New York 13902 (607) 729-0100
FAX: (607) 729-7328 Studios: 531 Gates Road, Vestal, NY 13850

RF RADIATION CERTIFICATION STATEMENT

The WSKG Public Telecommunications Council (WSKG) has applied for a facility which would operate on 91.5 MHz at a total effective radiated power (ERP) of 1.12 Kw (0.56 Kw horizontal, 0.56 Kw vertical) with its center of radiation located 160 meters above ground level (AGL). The proposed antenna would be side mounted on an existing multi-use tower and would not increase the height of that tower.

The existing tower has an overall height of 285 meters above ground level and is located in a rural area approximately one mile south of Binghamton, New York. The tower is shared by WICZ-TV, WSKG-TV, WSKG-FM, WAAL (FM) and WMXW (FM). The ERP and height AGL of the antenna center of radiation for each station is:

Station	ERP (Sum of H & V)	Antenna Radiation Center AGL
WICZ-TV	505 Kw (visual and aural. Aural is 8% of peak visual	275 meters
WSKG-TV	606 Kw (visual and aural. Aural is 10% of peak visual)	275 meters
WSKG-FM	20.0 Kw (4 bay antenna)	191 meters
WAAL (FM)	14.2 Kw (5 bay antenna)	234 meters
WMXW (FM)	1.12 Kw (2 bay antenna)	210 meters
Proposed	1.12 Kw (2 bay antenna)	160 meters

The transmitter site is private property in a primarily agricultural area. There are no dwelling structures, businesses or recreational facilities within 150 yards of the tower. The only vehicular access road has a gate which is kept locked when the site is unoccupied. The tower base is enclosed by an eight foot high chain link fence which is approximately 10 feet from the tower base in all directions. **Danger - High Voltage** and **No Trespassing** signs are installed on the fence and also at various places on the transmitter building.

Measurements made at the transmitter site in 1988 indicate that the highest level of RF radiation outside the transmitter building at ground level is 3% of the ANSI standard exposure limit. The addition of the proposed facility on the site is computed to add only 0.0015 mw/cm^2 under worst case conditions. Thus the RF radiation level at ground level even when adding the proposed facility RF level to the measured is clearly well below the 1.0 mw/cm^2 maximum listed in the radio frequency protection guide of the ANSI radiation guidelines.

RF RADIATION CERTIFICATION STATEMENT (cont'd)

The measurement report indicates the highest RF level inside the transmitter building is 10% of the ANSI standard exposure limit. The GE transmitter where this 10% level was found has since been removed from the building. The highest measurement inside the building is now 4% of the ANSI standard exposure limit. Again the addition of the proposed facility would not significantly increase the RF radiation level in the building much above 4%.

A copy of the measurement report is attached.

The RF radiation level above ground on the tower at various points where the broadcast antennas are located exceeds the ANSI standard exposure limit. To insure protection from RF radiation for workers anywhere on the tower, a formal written procedure to reduce or shut-down transmitter RF power when personnel are on the tower was implemented February 20, 1990 by Stainless Leasing of New York, owner and operator of the tower. All users of the tower, including WSKG, must be a signatory to this procedure. This requirement is incorporated in each tenant's lease by Stainless. A copy of the procedure is attached.

RF radiation in excess of ANSI guidelines occurs only above ground level at the proposed tower site and the level would increase with activation of the facility proposed by WSKG. Access to this area is restricted or the RF power is reduced to a safe level as described above and so there is no significant danger of excessive RF radiation on humans at this location.

Charles F. Mulvey 7/2/92

Charles F. Mulvey Date

Vice President for Engineering
WSKG Public Telecommunications Council

kz/CFM032

STAINLESS LEASING OF NEW YORK
INGRAHAM HILL ROAD, BINGHAMTON, NEW YORK
ANTENNA TOWER SITE

THIS TOWER IS A MULTIPLE ANTENNA SITE FOR THE FOLLOWING BROADCAST STATIONS:

STATION	VISUAL E R P	AURAL E R P	HEIGHT ABOVE GROUND
WICZ-TV	501 KW	50.1 KW	934 FEET
WSKG-TV	500 KW	50.0 KW	934 FEET
WSKG-FM		10.2 KW	625 FEET
WAAL-FM		7.1 KW	766 FEET

STAINLESS LEASING OF NEW YORK
ANTENNA SITE RADIATION MEASUREMENTS
NOVEMBER 15, 1988

A NARDA BROADBAND ISOTROPIC RADIATION METER, MODEL 8611, SERIAL NUMBER 09028, WAS USED IN CONJUNCTION WITH A MODEL 8626 PROBE, SERIAL NUMBER 02003. METER AND PROBE CALIBRATED JUNE 6, 1987.

A TOTAL OF SIX RADIALS WERE RUN. EACH RADIAL CONTAINED FROM 7 TO TEN MEASUREMENT POINTS. A TOTAL OF 49 MEASUREMENTS WERE MADE. THE RESULTS APPEAR IN THE FOLLOWING TABLE:

READINGS BELOW ARE MEASURED AS A PERCENT OF EXPOSURE LIMIT OF THE A.N.S.I. RADIO FREQUENCY PROTECTION GUIDE. ANSI C95.1-1982.

MONITORING POINT	% OF STANDARD
1	.45
2	1.20
3	.35
4	.60
5	.85
6	1.90
7	1.15
8	.10
9	.20

MONITORING POINT	% OF STANDARD	
10	.60	
11	1.10	
12	1.20	
13	1.45	
14	1.60	
15	.70	
16	.25	
17	.40	
18	.50	
19	1.10	
20	1.10	
21	2.00	
22	2.00	
23	2.50	
24	1.10	
25	.70	
26	.60	
27	1.60	
28	1.10	
29	1.10	
30	1.70	
31	1.50	
32	2.00	
33	**3.00**	**HIGHEST**
34	1.30	
35	.95	
36	.60	
37	.70	
38	.80	
39	.85	
40	1.80	
41	1.90	
42	1.00	
43	.25	
44	.30	
45	.40	
46	.60	
47	1.10	
48	.95	
49	.45	

WICZ-TV 40

WICZ TV TRANSMITTER INSIDE BUILDING, INGRAHAM HILL ROAD, BINGHAMTON, NEW YORK.

RADIATION MEASUREMENTS INSIDE BUILDING.

READINGS TAKEN NOVEMBER 15, 1988

METHOD USED FOR TAKING MEASUREMENTS

A NARDA BROADBAND ISOTROPIC RADIATION METER MODEL 8611, SERIAL NUMBER 09028 WAS USED IN CONJUNCTION WITH A MODEL 8682 PROBE, SERIAL NUMBER 02003. METER AND PROBE CALIBRATED JUNE 6, 1987.

A TOTAL OF 23 MEASUREMENTS WERE TAKEN INSIDE THE WICZ TRANSMITTER BUILDING INCLUDING MEASUREMENTS TAKEN IN SOME COMMON AREAS OF THE FACILITY.

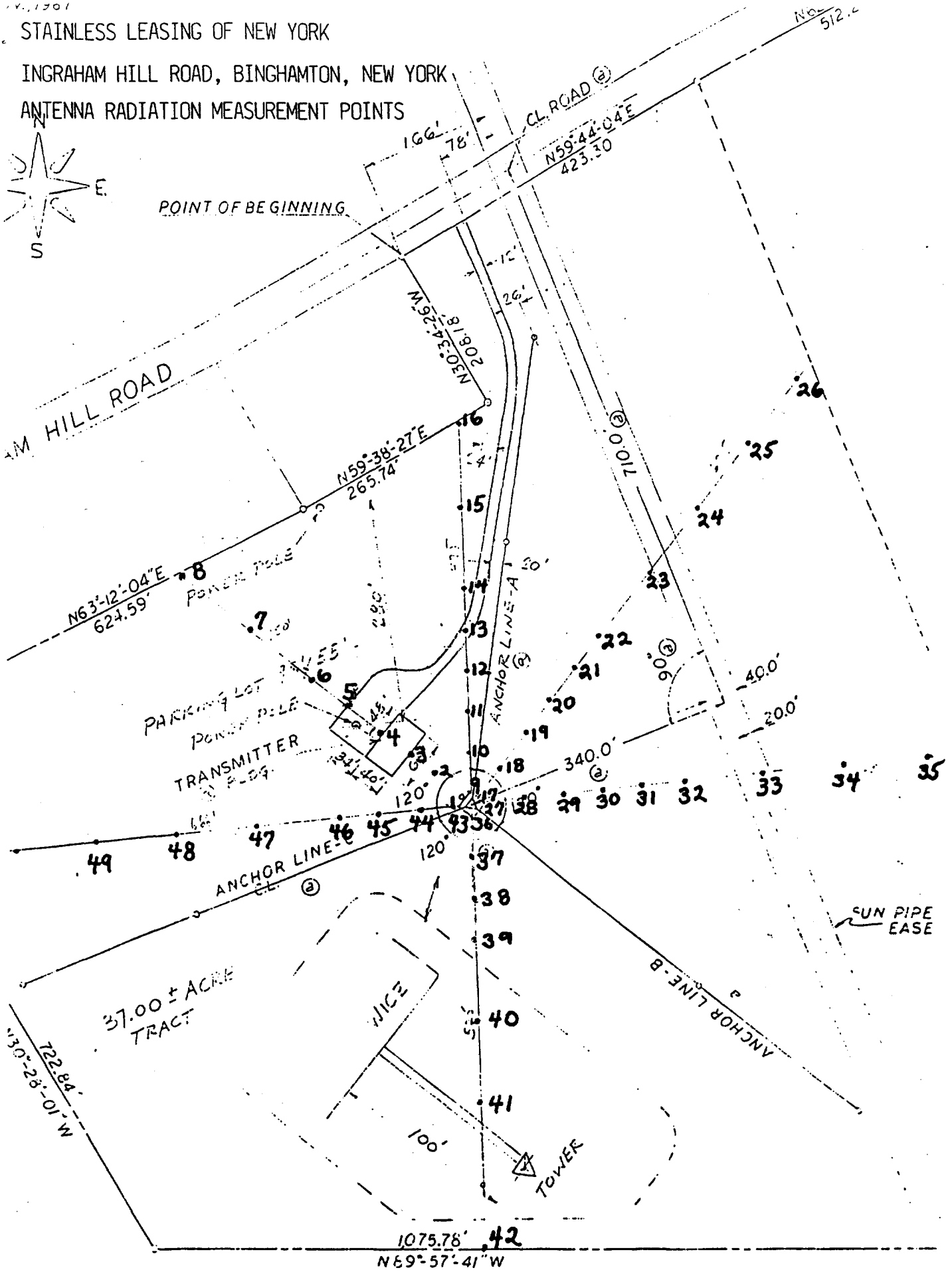
THE BELOW READINGS ARE SHOWN AS A PERCENT OF EXPOSURE LIMIT OF THE A.N.S.I. RADIO FREQUENCY GUIDE, ANSI C95.1-1982.

MEASUREMENT POINT		% OF ANSI STANDARD	
I1.	VESTIBULE	.30	
I2.	LAVATORY	.12	
I3.	INSIDE WICZ DOOR	.70	
I4.	RCA XMTR. CUBICLE FAN	.70	
I5.	RCA XMTR. AURAL DOOR CLOSED	.50	
I6.	RCA XMTR. AURAL DOOR OPEN	.65	
I7.	RCA XMTR. VISUAL DOOR CLOSED	.60	
I8.	RCA XMTR. VISUAL DOOR OPEN	4.00	
I9.	RCA XMTR. TUBE EXCITER DOOR CLOSED	.75	
I10.	RCA XMTR. TUBE EXCITER DOOR OPEN	.75	
I11.	REAR OF RCA TRANSMITTER	1.00	
I12.	REAR OF SOLID STATE EXCITER CABINET	1.00	
I13.	FRONT OF SOLID STATE EXCITER CAB.	1.20	
I14.	CENTER OF FILTERPLEXER	1.90	
I15.	BETWEEN GE & RCA XMTR. GE OFF	1.45	
I16.	SHOP	1.45	
I17.	HEAT EXCHANGE MOTOR	1.65	
I18.	HEAT EXCHANGE INTAKE	1.10	
I19.	FRONT COAXIAL SWITCH	1.60	
I20.	RENTAL AREA	1.60	
I21.	FRONT GE XMTR. ON	1.60	
I22.	GE XMTR. ON, CENTER DOOR OPEN	**10.00**	**HIGHEST**
I23.	GE XMTR. ON, ALL FRONT DOORS OPEN	**10.00**	**HIGHEST**
I24.	REAR OF GE XMTR. ON	2.00	

STAINLESS LEASING OF NEW YORK

INGRAHAM HILL ROAD, BINGHAMTON, NEW YORK

ANTENNA RADIATION MEASUREMENT POINTS



STAINLESS LEASING COMPANY
OF NEW YORK, INC.

NORTH WALES, PENNSYLVANIA, 19454

215-699-4871

PROCEEDURES FOR PROTECTION OF TOWER PERSONNEL CONCERNED WITH RADIATION

1. Plans and drawings for all major changes to antenna installations will be submitted to:

   Gino Ricciardelli
   WICZ-TV
   P. O. Box 1626
   Binghamton, NY 13902

   This requirement will allow time for other tenants to make comments; approving or disapproving the change.

   Also, submitt the date the work will commence and the name of the erector company you plan to use.

2. In the event of emergency work, advance notice shall be given as soon as possible to Gino Ricciardelli or Steve Miller at 770-4040. This will allow us time to notify the other tenants in order for them to alter their power levels.

3. Tenants shall cooperate in either lowering power or total shutdown; due to the wishes of the workers on the tower. In the event of an objection by any tenant or tenants, Gino Ricciardelli of Stainless Leasing will be the arbitrator between the parties involved in the dispute. An agreement must be reached before work can commence.

4. Also, when possible, consolidation of tower projects will permit less time of disruption; and might even lower cost of the project.

5. A representative of all parties involved shall be present during the time when the transmitter powers need to be lowered or shut down.

6. WAAL has requested work to be done on Monday or Tuesday whenever possible.

STAINLESS LEASING COMPANY
OF NEW YORK, INC.

NORTH WALES, PENNSYLVANIA, 19454

215-699-4871

PROCEEDURES FOR PROTECTION OF TOWER PERSONNEL CONCERNED WITH RADIATION

(Continued)

AGREED TO:

DATE: 2/22/90

SIGNED: Charles F. Imlay

TITLE: VP for Engineering

STATION: WSKG-FM/TV